



State of Arizona  
**Department of Education**

**Tom Horne**  
Superintendent of  
Public Instruction

**NSLP CN # 18-08**  
**USDA Memo # SP 13-2008**

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**MEMORANDUM**

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**TO:** School Health & Nutrition Program Sponsors

**FROM:** Mary Szafranski, Deputy Associate Superintendent  
Arizona Department of Education, Health and Nutrition Services

Lynn Ladd, NSLP Health Director  
Arizona Department of Education, School Health & Nutrition Programs

**DATE:** March 27, 2008

**SUBJECT:** Use of Vending Machines in the School Meal Programs: Q&A

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*Original Signed*

CN# 27-07 announced the interim guidance on the use of vending machines as a means of dispensing reimbursable meals. The United States Department of Agriculture (USDA) has now released the first set of Questions and Answers (Q&As) on the same topic.

The SP 03-2007 memo referenced below can be located on the USDA Food and Nutrition Service (FNS) website at [www.fns.usda.gov/cnd/Governance/policy.htm](http://www.fns.usda.gov/cnd/Governance/policy.htm). Periodic updates to the Q&As will also be located on the FNS website.

**Questions and Answers on Vending in the School Meal Programs**

**1) Are reimbursable meals offered through vending machines subject to the Offer vs. Serve (OVS) provisions?**

Yes, as stated in the SP-03-2007 memo, vending machines offering reimbursable meals are subject to the same procedures, menu planning requirements, competitive food rules, and OVS requirements that are applicable to meals offered on a service line with a cashier.

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**2) May meals vended after any OVS configurations run out be reimbursed?**

Once a vending machine can no longer dispense a complete reimbursable meal it must no longer be available for the purpose of serving reimbursable meals. A “complete meal” means a meal containing all planned components/menu items, before the exclusion of components/menu items permitted by OVS.

**3) In a school offering OVS, does predetermination of menu selections in a vending machine (resulting in a less than complete set of choices while others may have a different set of choices), undermine the intent of the OVS requirement?**

No, this is similar to multiple service lines in which every line may not offer all items. At a minimum, any vending machine used as part of the school meals programs must be able to dispense a complete meal. We encourage schools to stock as wide a variety as possible for students utilizing these machines, but understand that the choices may not be as robust as those offered in a traditional line.

**4) How is free, reduced price or paid eligibility tracked when using a vending machine?**

In order to distribute reimbursable meals, the school must be able to determine the student’s eligibility status, whether they are using a vending machine or a traditional serving line. How this is done would be determined by the school district’s point of service system and procedures.

**5) Do vending machines need to allow a student to add money on to his/her account and/or pay the difference between the account balance and the price of the item to be purchased, if the student doesn't have sufficient funds in the account?**

Vending machines do not have to accept money from students, but there does have to be a mechanism for the student who has money to participate in the program. This mechanism could be a student providing the money to a school representative who adds the money to the students’ account so that it is available for the meal; or assuring that the student has access to a traditional meal line that accepts cash.

**6) Are vending machines limited to the same time restrictions as other types of lunch service(10 AM to 2 PM) when serving lunch under the NSLP?**

Yes

**7) Do the identifiers (name, ID number, biometric, cashier, etc) for a vending machine need to be the same as in a traditional line?**

The reimbursable school meal vending machine must have the same number of identifiers as the traditional line, but the identifiers do not have to be the same ones. For example, a cashier may be an identifier in a traditional line, along with a pin number. The vending machine used in the school would need equivalent identifiers, but they could be a biometric check and a pin number.

Please contact the Arizona Department of Education, Health and Nutrition Programs with any questions pertaining to this information at 602-542-8700.

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